

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors.¹

Chapter 11

**EIGHTH APPLICATION OF FREDRIKSON & BYRON, P.A. FOR ALLOWANCE OF
FEES AND EXPENSES AS CHAPTER 11 COUNSEL FOR THE DEBTORS FROM
MARCH 1, 2025 THROUGH MARCH 31, 2025**

1. Steven R. Kinsella and Fredrikson & Byron, P.A. (collectively, “Fredrikson”) make this Application for allowance of fees for professional services rendered and for reimbursement of expenses incurred as Chapter 11 counsel for EPIC Companies Midwest, LLC, EPIC Companies Midwest 2023, LLC, EPIC Employee, LLC, EOLA Capital, LLC, and EC West Fargo, LLC (collectively, the “Debtors”) between March 1, 2025 and March 28, 2025 pursuant to 11 U.S.C. § 330.

2. In support of this Application, Fredrikson respectfully states as follows:

JURISDICTION

3. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334 and Fed. R. Bankr. P. 5005. This a core proceeding pursuant to 28 U.S.C. § 157(b). Venue

¹ In accordance with Fed. R. Bankr. P. 2002(n) and 1005 and 11 U.S.C. § 342(c), as applicable, the Debtors’ address is 400 10th Street SE, Minot, ND 58701 and their Employer Identification Numbers (EINs) are as follows: 83-2840705 (EPIC Companies Midwest, LLC), 88-3709518 (EPIC Companies Midwest 2023, LLC), 88-4112082 (EPIC Employee, LLC), 88-0554720 (EOLA Capital, LLC) and 82-5331354 (EC West Fargo, LLC).

is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The petitions commencing these Chapter 11 cases were filed on July 8, 2024 (the “Petition Date”). The cases are currently pending before this Court.

4. This Application arises under 11 U.S.C. §§ 503(b)(2), 328(a), 330, and 331. This Application is filed under Fed. R. Bankr. P. 2016 and 2002(a)(6). Notice of this Application is provided pursuant to the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court’s order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

BACKGROUND

5. On the Petition Date, the Debtors filed an application to employ Fredrikson as Chapter 11 counsel for the Debtors effective July 8, 2024. (ECF No. 13.) The Court approved the application to employ Fredrikson on July 25, 2024. (ECF No. 49.) A copy of that order is attached as **Exhibit A**.

6. On the Petition Date, the Debtors also filed a motion for an order establishing interim compensation procedures. (ECF No. 11.) The Court entered an order on August 14, 2024 granting the motion and allowing Fredrikson to file monthly applications for compensation. (ECF No. 72.) A copy of that order is attached as **Exhibit B**.

7. This is Fredrikson’s eighth application for allowance of fees and expenses under 11 U.S.C. § 331. Fredrikson received court approval for the following prior fee applications:

<u>Fee Application Amount</u>	<u>Date of Order Approving Fee Application</u>	<u>Docket No.</u>
\$80,535.96	10/21/2024	148
\$20,172.00	11/14/2024	164
\$37,675.00	12/13/2024	182
\$42,291.00	1/15/2024	206
\$36,048.00	2/12/2025	221
\$45,102.50	3/14/2025	254

<u>Fee Application Amount</u>	<u>Date of Order Approving Fee Application</u>	<u>Docket No.</u>
\$63,066.00	Pending ²	Pending
\$324,890.46		

8. Fredrikson believes that the Debtors are current in payment of ordinary operating expenses and any allowed administrative expenses, that any quarterly fees have been or will be paid as required to the United States Trustee, and that all monthly operating reports are being timely filed, including pursuant to any extensions granted by the United States Trustee.

RELIEF REQUESTED

9. **Post-Petition Fees.** By this Application, Fredrikson requests allowance of fees for professional services rendered during these Chapter 11 cases between March 1, 2025 and March 31, 2025 in the amount of **\$66,860.50**, and reimbursement of expenses in the amount of **\$3,837.50**, for a total of **\$70,698.00**.

10. The professional services rendered by Fredrikson are detailed on the attached **Exhibit C**. Those services include the tasks specifically described below:

(5001) Asset Analysis and Recovery: \$26,701.00

Services include meeting with the Chief Restructuring Officer (“CRO”) to conduct asset analyses and analyze settlement proposals; drafting complaints against borrowers; drafting settlement proposals and agreements; communicating with the mediator; and preparing for and attending mediation.³

² The objection deadline for Fredrikson’s seventh fee application was Friday, March 28, 2025. (ECF No. 242.)

³ The mediation took place on March 19, 2025, and involved four different defendant parties. Mr. Kinsella and Ms. Nixon both attended the mediation due to the potential complexity of mediating with the number of defendant parties. However, as described in the time records in **Exhibit C**, Fredrikson did not charge for Ms. Nixon’s time.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	26.1	2025	\$635	\$16,573.50
Katherine A. Nixon	20.3	2025	\$485	\$9,845.50
Shataia Stallings	1.2	2025	\$235	\$282.00
TOTAL	47.6			\$26,701.00

Blended Hourly Rate:	\$560.95
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(5002) Asset Disposition: \$582.00

Services include drafting, revising, and finalizing motion to approve settlement and emailing court staff regarding proposed order approving settlement.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	1.2	2025	\$485	\$582.00
TOTAL	1.2			\$582.00

Blended Hourly Rate:	\$485.00
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(5010) Employment and Fee Applications: \$1,806.00

Services include drafting Fredrikson's seventh fee application; assisting in preparing Fremstad Law's first fee application; and preparing CRO's seventh monthly operating report.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.4	2025	\$635	\$254.00
Katherine A. Nixon	3.2	2025	\$485	\$1,552.00
TOTAL	3.6			\$1,806.00

Blended Hourly Rate:	\$501.67
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(5013) Meetings and Communications with Creditors: \$907.50

Services include communicating with various creditors and counsel for the official committee of unsecured creditors (the "Committee"); meeting with the Committee; and preparing an address change request for a creditor.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	1.2	2025	\$635	\$762.00
Katherine A. Nixon	0.3	2025	\$485	\$145.50
TOTAL	1.5			\$907.50

Blended Hourly Rate:	\$605.00
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(5014) Non-Working Travel: \$4,301.00

Services include traveling to and from Fargo, North Dakota to attend mediation.⁴

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	8.2	2025	\$317.50	\$2,603.50
Katherine A. Nixon	7.0	2025	\$242.50	\$1,697.50
TOTAL	15.2			\$4,301.00

Blended Hourly Rate:	\$282.96
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(5015) Plan and Disclosure Statement: \$7,738.50

Services include drafting and revising plan of liquidation; drafting related corporate documents; revising motion for substantive consolidation; and drafting disclosure statement.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	10.7	2025	\$635	\$6,794.50
Katherine A. Nixon	1.6	2025	\$485	\$776.00
Michael S. Raum	0.2	2025	\$480	\$96.00
David B. Tibbals	0.2	2025	\$360	\$72.00
TOTAL	12.7			\$7,738.50

Blended Hourly Rate:	\$609.33
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(5018) Reporting: \$260.00

Services include assisting the CRO in finalizing monthly operating reports and emailing counsel for the United States Trustee regarding bank records.

⁴ Per the requirements of the United States Trustee's Office, non-working travel is charged at 50% of hourly rates.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.1	2025	\$485	\$48.50
Shataia Stallings	0.9	2025	\$235	\$211.50
TOTAL	1.0			\$260.00

Blended Hourly Rate:	\$260.00
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(0004) Adversary Proceeding Against Boulevard Square II, LLC et al.: \$1,491.50

Services include drafting, revising, and finalizing garnishment documents; reviewing calculation of amounts owed; preparing for and attending scheduling conference regarding jury trial issue; revising request for writ of execution and monitoring status of the same.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.1	2025	\$635	\$63.50
Katherine A. Nixon	2.4	2025	\$485	\$1,164.00
Austin Artz	0.8	2025	\$330	\$264.00
TOTAL	3.3			\$1,491.50

Blended Hourly Rate:	\$451.97
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(0005) Adversary Proceeding Against Pioneer Place, LLC: \$1,583.00

Services include finalizing garnishment documents; reviewing disclosure forms received from banks and discussing the same with the CRO; preparing request for writ of execution; communicating with potential receiver; and drafting motion to appoint receiver.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	1.5	2025	\$635	\$952.50
Katherine A. Nixon	1.3	2025	\$485	\$630.50
TOTAL	2.8			\$1,583.00

Blended Hourly Rate:	\$565.36
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(0007) Adversary Proceeding Against Greenfield Commons, LLC et al.: \$1,157.00

Services include making settlement proposals; communicating with defense counsel; and drafting motion for default judgment.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.6	2025	\$635	\$381.00
Katherine A. Nixon	1.6	2025	\$485	\$776.00
TOTAL	2.2			\$1,157.00

Blended Hourly Rate:	\$525.91
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(0008) Adversary Proceeding Against EPIC Holdings II, LLC: \$11,645.00

Services include drafting and revising motion for summary judgment and communicating with defense counsel.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	16.2	2025	\$635	\$10,287.00
Katherine A. Nixon	2.8	2025	\$485	\$1,358.00
TOTAL	19.0			\$11,645.00

Blended Hourly Rate:	\$612.89
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(0009) Adversary Proceeding Against U of J MU Jamestown, LLC: \$291.00

Services include reviewing order approving settlement; preparing notice of dismissal; and emailing interested parties regarding the same.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.6	2025	\$485	\$291.00
TOTAL	0.6			\$291.00

Blended Hourly Rate:	\$485.00
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(0010) Adversary Proceeding Against LTC – The Don, LLC: \$1,318.50

Services include drafting settlement agreement and communicating with defense counsel.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	2.0	2025	\$635	\$1,270.00
Katherine A. Nixon	0.1	2025	\$485	\$48.50
TOTAL	2.1			\$1,318.50

Blended Hourly Rate:	\$627.86
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(0011) Adversary Proceeding Against 36th and Veterans, LLC: \$2,101.50

Services include communicating with defense counsel; filling in dates for proposed scheduling order; preparing for and attending scheduling conference; reviewing scheduling and discovery order; and drafting and revising initial disclosures.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	1.4	2025	\$635	\$889.00
Katherine A. Nixon	2.5	2025	\$485	\$1,212.50
TOTAL	3.9			\$2,101.50

Blended Hourly Rate:	\$538.85
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(0012) Adversary Proceeding Against LTC – The Lincoln, LLC: \$63.50

Services include reviewing filed answer.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.1	2025	\$635	\$63.50
TOTAL	0.1			\$63.50

Blended Hourly Rate:	\$635.00
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(0013) Adversary Proceeding Against Pioneer Place Holdings, LLC: \$481.50

Services include communicating with interested parties regarding settlement proposal; revising and finalizing motion for default judgment; and analyzing potential receivership options.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.3	2025	\$635	\$190.50
Katherine A. Nixon	0.6	2025	\$485	\$291.00
TOTAL	0.9			\$481.50

Blended Hourly Rate:	\$535.00
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(0014) Adversary Proceeding Against EPIC Management, LLC: \$2,983.00

Services include drafting and finalizing pleadings to domesticate judgment; contacting clerk's office in Ward County; emailing the CRO regarding bank accounts; and reviewing state court pleadings filed against defendant.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.3	2025	\$635	\$190.50
Katherine A. Nixon	2.5	2025	\$485	\$1,212.50
Austin Artz	4.6	2025	\$330	\$1,518.00
Mary Etter	0.4	2025	\$155	\$62.00
TOTAL	7.8			\$2,983.00

Blended Hourly Rate:	\$382.44
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(0016) Adversary Proceeding Against HI West Acres, LLC, f/k/a EPIC Hospitality, LLC: \$317.50

Services include communicating with defense counsel and the CRO regarding information requests.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.5	2025	\$635	\$317.50
TOTAL	0.5			\$317.50

Blended Hourly Rate:	\$635.00
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(0019) Adversary Proceeding Fargo South Hospitality, LLC: \$556.50

Services include communicating with defense counsel and emailing the CRO regarding filed answer.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.8	2025	\$635	\$508.00
Katherine A. Nixon	0.1	2025	\$485	\$48.50
TOTAL	0.9			\$556.50

Blended Hourly Rate:	\$618.33
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(0023) Adversary Proceeding Against The Tracks – Maverick, LLC: \$97.00

Services include reviewing and revising draft notice of appearance.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.2	2025	\$485	\$97.00
TOTAL	0.2			\$97.00

Blended Hourly Rate:	\$485.00
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(0026) Adversary Proceeding Against Dutch Mill Development, LLC: \$97.00

Services include emailing the CRO regarding response from defendant and motion to extend time to respond to complaint.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.2	2025	\$485	\$97.00
TOTAL	0.2			\$97.00

Blended Hourly Rate:	\$485.00
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(0026) Adversary Proceeding Against Northern Mall Partners, LLC: \$381.00

Services include communicating with defense counsel and engaging in settlement negotiations.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.6	2025	\$635	\$381.00
TOTAL	0.6			\$381.00

Blended Hourly Rate:	\$635.00
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TOTAL POST-PETITION FEES: \$66,860.50

11. **Reimbursement of Expenses.** In the course of this representation, Fredrikson has also incurred expenses detailed as part of Matter Nos. 5000, 0004, and 0014 on **Exhibit C**, and requests allowance thereof as follows:

<u>Expenses</u>	<u>Amount</u>
Summons and Complaint – Filing Fees	\$3,150.00
Certified Copies	\$25.00
Hotel – Fargo, North Dakota for Mediation	\$554.34
Writs of Execution – Filing Fees	\$20.00
Postage	\$78.16
Domesticating Judgment – Filing Fees	\$10.00
TOTAL	\$3,837.50

TOTAL EXPENSES: \$3,837.50

12. All services for which fees are requested by Fredrikson were performed for and on behalf of the Debtors, and not on behalf of any committee, creditor, or other person.

13. The amount requested constitutes reasonable compensation for actual, necessary services rendered by Fredrikson, based on the nature, the extent, and the value of such services, the time spent on such services, and the cost of comparable services other than in a case under Title 11. Fredrikson has not entered into any agreement, express or implied, with any other party-in-interest, including the Debtors, any creditor, receiver, trustee, or any representative of any of them, or with any attorney for such party-in-interest in the proceedings, for the purpose of fixing fees or other compensation to be paid to such party-in-interest in the proceedings for services rendered or expenses incurred from the assets of the estate in excess of the compensation allowed by law.

WHEREFORE, Fredrikson respectfully requests that the Court enter an order:

A. Allowing Fredrikson’s fees incurred between March 1, 2025 and March 31, 2025 in the amount of **\$66,860.50**, and expenses in the amount of **\$3,837.50**, totaling **\$70,698.00**;

B. Authorizing the Debtors to pay Fredrikson such allowed postpetition fees and expenses;

C. Granting administrative expense priority to Fredrikson’s allowed fees and expenses; and

D. Granting such other and further relief as may be just and proper.

Dated: April 7, 2025

/s/ Steven R. Kinsella

Michael S. Raum (#05676)

FREDRIKSON & BYRON, P.A.

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Fargo, ND 58102-4991

701.237.8200

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Steven R. Kinsella (#09514)

Katherine A. Nixon (*pro hac vice* MN #0402772)

FREDRIKSON & BYRON, P.A.

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612.492.7000

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ATTORNEYS FOR DEBTORS

AFFIDAVIT

I, Steven R. Kinsella, an attorney at the law firm of Fredrikson & Byron, P.A., declare under penalty of perjury that the foregoing Eighth Application of Fredrikson & Byron, P.A. for Allowance of Fees and Expenses as Chapter 11 Counsel for the Debtors from March 1, 2025 Through March 31, 2025 is true and correct according to the best of my knowledge, information, and belief.

Dated: April 7, 2025

/s/ Steven R. Kinsella
Steven R. Kinsella

EXHIBIT A

CourtAlert® Case Management

From: ecf@ndb.uscourts.gov
Sent: 7/25/2024 12:56:27 PM
To: nate_olson@ndb.uscourts.gov
Subject: Ch-11 24-30281 EPIC Companies Midwest, LLC Order on Application to Employ

CAUTION: EXTERNAL E-MAIL

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30-page limit do not apply.

U.S. Bankruptcy Court

District of North Dakota

Notice of Electronic Filing

The following transaction was received from vck, Court entered on 7/25/2024 at 12:56 PM CDT and filed on 7/25/2024

Case Name: EPIC Companies Midwest, LLC

Case Number: [24-30281](#)

Document Number: [49](#)

Docket Text:

Order Approving Application to Employ Steven R. Kinsella and Fredrikson & Byron, P.A. as counsel for Debtor EPIC Companies Midwest, LLC effective July 8, 2024 (Related Doc. [13]). The application to employ is APPROVED subject to the limitations on compensation provided by 11 U.S.C. § 328. This order is not a determination that the services or rates charged are necessary and reasonable. The person or entity employed under this order shall file a fee application in accordance with the Bankruptcy Code and Federal Rules of Bankruptcy Procedures. See Fed. R. Bank. P. 2016, 2017 and 11 U.S.C. 329, 330. Applicant must also comply with Local Rules. As required by applicable federal rule or statute, the Movant shall serve this docket text only order on all appropriate parties that will not receive notice of electronic filing. By Judge Shon Hastings (Text order only). Signed on 7/25/2024 (vck)

The following document(s) are associated with this transaction:

24-30281 Notice will be electronically mailed to:

Douglas Christensen on behalf of Creditor Beth Holmes
dougc@grandforkslaw.com,
sarah@grandforkslaw.com;jen@grandforkslaw.com;julie@grandforkslaw.com

Michael Gust on behalf of Interested Party Bank Forward
mlgfilings@andersonbottrell.com, jernst@abstlaw.net

Joseph D Hackman on behalf of Interested Party Bank Forward
jhackman@abstlaw.net

Peter B. Hankla on behalf of Interested Party Randy and Dorothy Henke
phankla@mcgeelaw.com

Steven R Kinsella on behalf of Debtor EC West Fargo, LLC
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EOLA Capital, LLC
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Companies Midwest 2023, LLC
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Companies Midwest, LLC
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Employee, LLC
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John M Krings, Jr. on behalf of Creditor Cornerstone Bank
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Katherine A. Nixon on behalf of Debtor EPIC Companies Midwest, LLC
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Richard P. Olson on behalf of Creditor Bruce & Diane Walker
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Katrina A. Turman Lang on behalf of Creditor Dietz Properties, LLC
klang@woldlaw.com, melanie@turmanlaw.com

Katrina A. Turman Lang on behalf of Creditor Candice Dietz
klang@woldlaw.com, melanie@turmanlaw.com

Katrina A. Turman Lang on behalf of Creditor Larry Dietz
klang@woldlaw.com, melanie@turmanlaw.com

Sarah J. Wencil on behalf of U.S. Trustee Robert B. Raschke
sarah.j.wencil@usdoj.gov

Benjamin Williams on behalf of Creditor Cullen Insulation, Inc.
ben@kennellybusinesslaw.com, beth@kennellybusinesslaw.com

Benjamin Williams on behalf of Creditor Daniel Frisch
ben@kennellybusinesslaw.com, beth@kennellybusinesslaw.com

24-30281 Notice will not be electronically mailed to:

EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors.

Chapter 11

**ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR RETAINED PROFESSIONALS**

Debtors filed a Motion for an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief. Doc. 11. Pursuant to the notice of the Motion [Doc. 16], objections to the Motion were due by July 30, 2024.

Debtors served notice of the Motion. The Court received no objections to the Motion. The Court held a hearing on the Motion on August 14, 2024. Based upon the Motion and the Declaration of Patrick Finn [Doc. 6] and for the reasons stated on the record at the August 14, 2024, hearing, the Court finds that the circumstances of these cases warrant granting the relief provided below.

IT IS ORDERED that, except as otherwise provided in any order of the Court, professionals employed in this bankruptcy case, including Fredrikson & Byron, P.A., shall be permitted to seek interim payment of compensation and reimbursement of expenses by filing monthly applications for interim compensation and reimbursement of expenses.

IT IS FURTHER ORDERED that Debtors are authorized to pay all reasonable amounts invoiced by Lighthouse Management Group, Inc. (“Lighthouse”) for fees and expenses on a bi-weekly basis.

IT IS FURTHER ORDERED that Lighthouse will file with the Court and serve on Debtors, the United States Trustee, and any statutory committee appointed in this case (the “Notice Parties”) a monthly staffing report, filed and served by the 20th of each month for the previous month, identifying the Lighthouse employees who worked on this case, the total hours billed by Lighthouse, and a summary of the tasks performed. Lighthouse will also file with the Court and serve on the Notice Parties a quarterly compensation report by the 20th of each month following the end of a quarter, showing the total fees and expenses for the preceding quarter. These reports will be deemed applications for interim compensation under sections 328 and 330. Parties in interest may object to the reports within 21 days after notice. The Court will rule on the applications after the deadline to object passes or after a hearing on the application.

IT IS FURTHER ORDERED that Debtors will allocate the fees and expenses approved among Debtors pro rata if the professionals charge for tasks that generally apply to all cases and to the appropriate Debtor if the tasks relate solely to a specific Debtor.

Dated: August 14, 2024.



SHON HASTINGS, JUDGE
UNITED STATES BANKRUPTCY COURT

EXHIBIT C

Fredrikson

Invoice: 1920649
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.5000

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Case Administration

Total For Current Costs and Other Charges: \$ 3,814.54

Total For Current Invoice: \$ 3,814.54

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



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Tax ID: [REDACTED]

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Invoice: 1920649
Invoice Date: April 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
03/05/25	1914072	375.00		375.00
Total Prior Balance:				\$ 375.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1920649
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.5000

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Costs and Other Charges

	<u>Amount</u>
03/04/25 COURTS/USBC-ND-P - Summons and Complaint – Adversary Fee - A1608711	350.00
03/04/25 COURTS/USBC-ND-T - Certified Copies Fees	25.00
03/10/25 COURTS/USBC-ND-P - Summons and Complaint – Adversary Fee	2,800.00
03/19/25 Travel Steven R. Kinsella - Hotel - Lodging - Hotel Stay - EPIC Mediation	282.32
03/19/25 Steven R. Kinsella - Hotel - Lodging - Hotel Stay - EPIC Mediation	272.02
03/26/25 Filing fee North Dakota District Court (PO Box 2806 Fargo ND 58108) - 3/25/25 -2 - Writ Execution Fee	10.00
03/26/25 Filing fee North Dakota District Court (PO Box 2806 Fargo ND 58108) - 3.26.2025 -1 - Writ of Execution fee	10.00
Postage Charges	65.20

Current Costs and Other Charges: \$ 3,814.54

Invoice Totals

Total For Current Costs and Other Charges: \$ 3,814.54

Total For Current Invoice: \$ 3,814.54

Fredrikson

Invoice: 1920650
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.5001

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Asset Analysis and Recovery

Total for Current Legal Fees:	\$ 28,350.00
Less Adjustment for No Charge Items:	\$ (1,649.00)
Total For Current Invoice:	\$ 26,701.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

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Invoice: 1920650
Invoice Date: April 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
03/05/25	1914073	28,678.50		28,678.50
Total Prior Balance:				\$ 28,678.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1920650
 Invoice Date: April 3, 2025
 Client Number: 097807
 Matter Number: 097807.5001

EPIC Companies Midwest, LLC
 Attn: Patrick Finn
 900 Long Lake Rd, Suite 180
 Lighthouse Management Group, Inc.
 New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/03/25	K. Nixon	Meeting with CRO regarding asset analysis (1.0); draft complaint(s) against borrower(s) (1.5).	2.50	1,212.50
03/03/25	S. Kinsella	Meeting with CRO (.9); communications with borrowers' counsel regarding mediation (.3); phone call with borrowers' counsel regarding the same (.3); follow up call with CRO regarding the same (.4); analyze settlement status (.2).	2.10	1,333.50
03/04/25	K. Nixon	Draft complaint(s) against borrower(s).	5.60	2,716.00
03/04/25	S. Kinsella	Meeting with CRO regarding status of settlements (.9); prepare for and participate in mediation session with mediator (.8); follow up communications with CRO, Committee counsel, and opposing counsel (.6); revise settlement agreement and send to project borrower (.8); communications with borrower's counsel regarding the same (.3); prepare and send settlement proposals to counsel for project borrowers (.5); follow up communications regarding the same (.2).	4.00	2,540.00
03/05/25	S. Kinsella	Revise settlement agreement and communications with borrower's counsel regarding the same.	0.50	317.50
03/06/25	K. Nixon	Draft complaint against borrower.	1.10	533.50
03/06/25	S. Kinsella	Revise settlement agreement and communications with client regarding the same (.4); phone call with borrower counsel regarding various settlement proposals (.7); phone call with CRO regarding the same (.3).	1.40	889.00
03/07/25	K. Nixon	Revise and draft complaint(s) against borrower(s).	1.70	824.50
03/07/25	S. Kinsella	Provide instruction regarding remaining complaints.	0.20	127.00



Invoice:
Invoice Date:
Page:

1920650
April 3, 2025
2

03/10/25	S. Stallings	Finalize adversary complaints against various borrowers and e-file.	0.60	141.00
03/10/25	K. Nixon	Meeting with CRO regarding asset analysis (0.5); email G. Singer re: spreadsheets for mediation (0.2); finalize and coordinate filing of eight adversary complaints (1.8).	2.50	1,212.50
03/10/25	S. Kinsella	Revise settlement agreement and coordinate with borrower's counsel (.4); finalize eight complaints and case commencements (.4); meeting with CRO (.7); communications with mediator (.2); prepare documents for mediation (.2).	1.90	1,206.50
03/11/25	S. Kinsella	Finalize JP Place settlement agreement (.4); communications with project borrower counsel regarding loan documents and tracking analysis (.3); meeting with CRO regarding outstanding adversary proceedings (.3); settlement communications with project borrower counsel (.1).	1.10	698.50
03/11/25	S. Stallings	Attention to summons for adversary complaints and arrange for service (.4); telephone call with court clerk regarding same (.2).	0.60	141.00
03/12/25	S. Kinsella	Revise motion to approve JP Place settlement agreement (.3); communications with CRO regarding mediation and settlement status (.3).	0.60	381.00
03/13/25	S. Kinsella	Meeting with mediator (.7); follow up meeting with CRO (.5); prepare analysis for mediation (1.3); communications with borrower counsel regarding answer deadline (.1); communications with borrower counsel regarding settlement proposal (.1).	2.70	1,714.50
03/14/25	K. Nixon	Review certificates of service for misc. adversary proceedings.	0.20	97.00
03/17/25	K. Nixon	Email filed copies of complaints to CRO (0.2); meeting with CRO regarding asset analysis (0.7).	0.90	436.50
03/17/25	S. Kinsella	Meeting with CRO (.6); revise mediation analysis (.3); prepare for mediation (.2).	1.10	698.50
03/18/25	S. Kinsella	Prepare for mediation.	0.60	381.00
03/19/25	S. Kinsella	Prepare for and participate in mediation.	7.10	4,508.50
03/19/25	K. Nixon	Attend and participate in mediation. (No Charge)	3.40	1,649.00
03/20/25	S. Kinsella	Communications with borrower counsel regarding settlement proposals.	0.30	190.50
03/21/25	S. Kinsella	Communications with borrower's counsel regarding building sale status.	0.20	127.00



Invoice: 1920650
 Invoice Date: April 3, 2025
 Page: 3

03/24/25	S. Kinsella	Prepare summary of information requested from various project borrowers (1.2); communications with counsel for project borrowers (.3).	1.50	952.50
03/24/25	K. Nixon	Meeting with CRO regarding asset analysis.	1.20	582.00
03/25/25	S. Kinsella	Analyze jury demand issue.	0.10	63.50
03/27/25	K. Nixon	Meeting with conflicts counsel re: posture of adversary proceedings generally.	0.50	242.50
03/31/25	K. Nixon	Prepare for and attend meeting with CRO regarding asset analysis (0.7); draft complaint against borrower (3.4).	4.10	1,988.50
03/31/25	S. Kinsella	Meeting with CRO.	0.70	444.50
Current Legal Fees:			51.00	\$ 28,350.00
Less Adjustment for No Charge Items:				(1,649.00)
Current Legal Fees After Adjustments:				\$ 26,701.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	26.10	16,573.50
Katherine Nixon	485.00	20.30	9,845.50
Katherine Nixon	0.00	3.40	0.00
Shataia Stallings	235.00	1.20	282.00
Total		51.00	\$ 26,701.00

Invoice Totals

Total for Current Legal Fees:	\$ 28,350.00
Less Adjustment for No Charge Items:	\$ (1,649.00)
Total For Current Invoice:	\$ 26,701.00

Fredrikson

Invoice: 1920651
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.5002

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Asset Disposition

Total for Current Legal Fees: \$ 582.00

Total For Current Invoice: \$ 582.00

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



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Invoice: 1920651
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.5002

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/12/25	K. Nixon	Draft, revise, and finalize motion to approve settlement with JP Place and emails re: the same.	1.10	533.50
03/13/25	K. Nixon	Email court staff re: proposed order approving settlement.	0.10	48.50
Current Legal Fees:			1.20	\$ 582.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Katherine Nixon	485.00	1.20	582.00
Total		1.20	\$ 582.00

Invoice Totals

Total for Current Legal Fees:	\$ 582.00
Total For Current Invoice:	\$ 582.00

Fredrikson

Invoice: 1920652
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.5010

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Employment and Fee Applications

Total for Current Legal Fees: \$ 1,806.00

Total For Current Invoice: \$ 1,806.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

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Invoice: 1920652
Invoice Date: April 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
03/05/25	1914076	2,482.00		2,482.00
Total Prior Balance:				\$ 2,482.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1920652
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.5010

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/03/25	S. Kinsella	Provide instruction regarding next few application.	0.10	63.50
03/05/25	S. Kinsella	Review and revise Fredrikson fee application (.2); review and revise Fremstad fee application (.1).	0.30	190.50
03/05/25	K. Nixon	Draft Fredrikson's seventh fee application and assist in drafting Fremstad's first fee application.	2.60	1,261.00
03/06/25	K. Nixon	Revise Fredrikson's seventh fee application and email to Fremstad Law re: first fee application.	0.30	145.50
03/14/25	K. Nixon	Email client re: approval of monthly staffing report and fee app.	0.10	48.50
03/19/25	K. Nixon	Assist in preparing CRO's seventh monthly staffing report.	0.20	97.00
Current Legal Fees:			3.60	\$ 1,806.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	0.40	254.00
Katherine Nixon	485.00	3.20	1,552.00
Total		3.60	\$ 1,806.00

Invoice Totals

Total for Current Legal Fees: \$ 1,806.00

Total For Current Invoice: \$ 1,806.00

Fredrikson

Invoice: 1920653
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.5013

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Meetings and Communications with Creditors

Total for Current Legal Fees: \$ 907.50

Total For Current Invoice: \$ 907.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

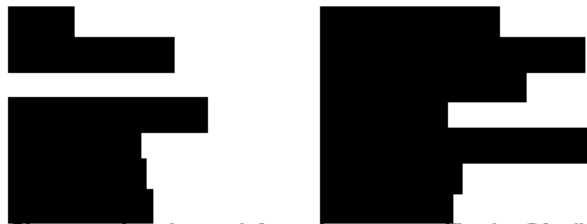
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P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

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Invoice: 1920653
Invoice Date: April 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
11/04/24	1888543	57.50		57.50
03/05/25	1914077	2,116.50		2,116.50
Total Prior Balance:				\$ 2,174.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1920653
 Invoice Date: April 3, 2025
 Client Number: 097807
 Matter Number: 097807.5013

EPIC Companies Midwest, LLC
 Attn: Patrick Finn
 900 Long Lake Rd, Suite 180
 Lighthouse Management Group, Inc.
 New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/03/25	S. Kinsella	Communications with Committee counsel.	0.30	190.50
03/04/25	S. Kinsella	Review communications to creditors.	0.10	63.50
03/05/25	K. Nixon	Attention to address change request from creditor.	0.10	48.50
03/11/25	S. Kinsella	Phone call and follow up emails with creditor.	0.40	254.00
03/11/25	K. Nixon	Review letter requesting change of address and email filed copy to counsel for committee.	0.20	97.00
03/12/25	S. Kinsella	Phone call with Committee counsel regarding mediation.	0.30	190.50
03/20/25	S. Kinsella	Communications with creditor.	0.10	63.50
Current Legal Fees:			1.50	\$ 907.50

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	1.20	762.00
Katherine Nixon	485.00	0.30	145.50
Total		1.50	\$ 907.50

Invoice Totals

Total for Current Legal Fees: \$ 907.50

Total For Current Invoice: \$ 907.50

Fredrikson

Invoice: 1920654
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.5014

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Non-Working Travel

Total for Current Legal Fees:	\$ 8,602.00
Less Courtesy Adjustment:	\$ (4,301.00)
Total For Current Invoice:	\$ 4,301.00

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



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Tax ID: [REDACTED]

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Invoice: 1920654
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.5014

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/18/25	S. Kinsella	Travel to mediation.	4.20	2,667.00
03/18/25	K. Nixon	Travel to Fargo, ND for mediation.	3.50	1,697.50
03/19/25	S. Kinsella	Travel back from mediation.	4.00	2,540.00
03/19/25	K. Nixon	Travel back to Minneapolis, MN from Fargo, ND.	3.50	1,697.50
Current Legal Fees:			15.20	\$ 8,602.00
Less Courtesy Adjustment:				(4,301.00)
Current Legal Fees After Adjustments:				\$ 4,301.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	8.20	5,207.00
Katherine Nixon	485.00	7.00	3,395.00
Total		15.20	\$ 8,602.00

Invoice Totals

Total for Current Legal Fees:	\$ 8,602.00
Less Courtesy Adjustment:	\$ (4,301.00)
Total For Current Invoice:	\$ 4,301.00

Fredrikson

Invoice: 1920655
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.5015

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Plan and Disclosure Statement

Total for Current Legal Fees: \$ 7,738.50

Total For Current Invoice: \$ 7,738.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

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Invoice: 1920655
Invoice Date: April 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
03/05/25	1914078	10,207.00		10,207.00
Total Prior Balance:				\$ 10,207.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1920655
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.5015

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/02/25	D. Tibbals	Revisions to memo/letter outlining proposed revisions to operating agreements to address disproportionate dilution, board seat, minority protections.	0.20	72.00
03/02/25	M. Raum	Revisions to term sheet related to anti-dilution provisions.	0.20	96.00
03/03/25	S. Kinsella	Revise plan.	0.60	381.00
03/04/25	S. Kinsella	Continue to revise and draft plan.	1.60	1,016.00
03/05/25	S. Kinsella	Finalize draft of plan and circulate to client.	2.40	1,524.00
03/10/25	S. Kinsella	Revise plan.	0.90	571.50
03/10/25	K. Nixon	Review and revise motion for substantive consolidation and plan of liquidation.	1.60	776.00
03/11/25	S. Kinsella	Review additional substantive consolidation analysis.	0.10	63.50
03/13/25	S. Kinsella	Analyze substantive consolidation issues.	0.10	63.50
03/18/25	S. Kinsella	Consult with Committee counsel and CRO regarding plan.	0.50	317.50
03/20/25	S. Kinsella	Continue to draft disclosure statement.	0.40	254.00
03/21/25	S. Kinsella	Draft disclosure statement.	2.30	1,460.50
03/23/25	S. Kinsella	Draft disclosure statement.	1.80	1,143.00
Current Legal Fees:			12.70	\$ 7,738.50



Invoice: 1920655
Invoice Date: April 3, 2025
Page: 2

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	10.70	6,794.50
Katherine Nixon	485.00	1.60	776.00
Michael S. Raum	480.00	0.20	96.00
David B. Tibbals	360.00	0.20	72.00
Total		12.70	\$ 7,738.50

Invoice Totals

Total for Current Legal Fees: \$ 7,738.50

Total For Current Invoice: \$ 7,738.50

Fredrikson

Invoice: 1920656
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.5018

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Reporting

Total for Current Legal Fees: \$ 260.00

Total For Current Invoice: \$ 260.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1920656
Invoice Date: April 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
09/05/24	1876154	7,565.50	(3,001.50)	4,564.00
03/05/25	1914079	793.00		793.00
Total Prior Balance:				\$ 5,357.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1920656
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.5018

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/19/25	S. Stallings	Finalize February 2025 monthly operating reports for EPIC debtors and efile (.7); and compile and submit bank statements to UST (.2).	0.90	211.50
03/19/25	K. Nixon	Review February MORs.	0.10	48.50
Current Legal Fees:			1.00	\$ 260.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Katherine Nixon	485.00	0.10	48.50
Shataia Stallings	235.00	0.90	211.50
Total		1.00	\$ 260.00

Invoice Totals

Total for Current Legal Fees: \$ 260.00

Total For Current Invoice: \$ 260.00

Fredrikson

Invoice: 1920657
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0004

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Adversary against Boulevard Square

Total for Current Legal Fees:	\$ 1,491.50
Total For Current Costs and Other Charges:	\$ 12.96
Total For Current Invoice:	\$ 1,504.46

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



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Invoice: 1920657
Invoice Date: April 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
03/05/25	1914080	2,767.50		2,767.50
Total Prior Balance:				\$ 2,767.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1920657
 Invoice Date: April 3, 2025
 Client Number: 097807
 Matter Number: 097807.0004

EPIC Companies Midwest, LLC
 Attn: Patrick Finn
 900 Long Lake Rd, Suite 180
 Lighthouse Management Group, Inc.
 New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/03/25	A. Artz	Review, revise, and send garnishment packet.	0.80	264.00
03/03/25	K. Nixon	Finalize and coordinate mailing of garnishment documents.	0.50	242.50
03/05/25	K. Nixon	Phone call with Western State Bank.	0.20	97.00
03/17/25	K. Nixon	Email client re: receipt of garnishment disclosure forms.	0.10	48.50
03/20/25	S. Kinsella	Analyze garnishment calculation.	0.10	63.50
03/25/25	K. Nixon	Prepare request for writ of execution.	0.60	291.00
03/26/25	K. Nixon	Prepare for and attend scheduling conference re: jury trial issue and email CRO re: tentative briefing schedule.	0.50	242.50
03/26/25	K. Nixon	Revise request for writ of execution and coordinate mailing of the same.	0.10	48.50
03/31/25	K. Nixon	Check status of request for writ of execution and coordinate second garnishment.	0.40	194.00
Current Legal Fees:			3.30	\$ 1,491.50

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	0.10	63.50
Katherine Nixon	485.00	2.40	1,164.00
Austin Artz	330.00	0.80	264.00
Total		3.30	\$ 1,491.50



Invoice: 1920657
Invoice Date: April 3, 2025
Page: 2

Costs and Other Charges

Postage Charges 12.96

Current Costs and Other Charges: \$ 12.96

Invoice Totals

Total for Current Legal Fees: \$ 1,491.50

Total For Current Costs and Other Charges: \$ 12.96

Total For Current Invoice: \$ 1,504.46

Fredrikson

Invoice: 1920658
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0005

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Adversary against Pioneer Place, LLC

Total for Current Legal Fees: \$ 1,583.00

Total For Current Invoice: \$ 1,583.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



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Fredrikson

Invoice: 1920658
Invoice Date: April 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
03/05/25	1914081	4,337.00		4,337.00
Total Prior Balance:				\$ 4,337.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1920658
 Invoice Date: April 3, 2025
 Client Number: 097807
 Matter Number: 097807.0005

EPIC Companies Midwest, LLC
 Attn: Patrick Finn
 900 Long Lake Rd, Suite 180
 Lighthouse Management Group, Inc.
 New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/03/25	K. Nixon	Finalize and coordinate mailing of garnishment documents.	0.30	145.50
03/11/25	S. Kinsella	Attention to garnishments.	0.10	63.50
03/17/25	S. Kinsella	Review garnishment responses and discuss the same with CRO.	0.40	254.00
03/20/25	S. Kinsella	Review settlement proposal and provide instruction regarding potential receivership action.	0.30	190.50
03/21/25	S. Kinsella	Phone call with potential receiver.	0.40	254.00
03/25/25	K. Nixon	Prepare request for writ of execution.	0.50	242.50
03/25/25	S. Kinsella	Communications with potential receiver.	0.20	127.00
03/26/25	K. Nixon	Revise request for writ of execution and coordinate mailing of the same.	0.20	97.00
03/28/25	K. Nixon	Draft motion to appoint receiver.	0.10	48.50
03/31/25	K. Nixon	Emails to potential receiver and coordinate meeting with the same.	0.20	97.00
03/31/25	S. Kinsella	Provide instruction regarding receivership pleadings.	0.10	63.50
Current Legal Fees:			2.80	\$ 1,583.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	1.50	952.50
Katherine Nixon	485.00	1.30	630.50
Total		2.80	\$ 1,583.00



Invoice: 1920658
Invoice Date: April 3, 2025
Page: 2

Invoice Totals

Total for Current Legal Fees:	\$ 1,583.00
Total For Current Invoice:	\$ 1,583.00

Fredrikson

Invoice: 1920659
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0007

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Adversary against Greenfield Commons

Total for Current Legal Fees: \$ 1,157.00

Total For Current Invoice: \$ 1,157.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



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Tax ID: [REDACTED]

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Invoice: 1920659
Invoice Date: April 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
03/05/25	1914083	966.50		966.50
Total Prior Balance:				\$ 966.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1920659
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0007

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/04/25	S. Kinsella	Propose settlement to defendants' counsel.	0.10	63.50
03/13/25	S. Kinsella	Communications with opposing counsel regarding default judgment and settlement proposal.	0.30	190.50
03/13/25	K. Nixon	Draft motion for default judgment against Greenfield defendants and email filed copy to client.	1.20	582.00
03/17/25	K. Nixon	Emails to and phone call with A. Artz re: requested property information.	0.30	145.50
03/18/25	K. Nixon	Emails to client re: requested property information.	0.10	48.50
03/20/25	S. Kinsella	Communications with opposing counsel regarding settlement proposals.	0.20	127.00
Current Legal Fees:			2.20	\$ 1,157.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	0.60	381.00
Katherine Nixon	485.00	1.60	776.00
Total		2.20	\$ 1,157.00

Invoice Totals

Total for Current Legal Fees: \$ 1,157.00

Total For Current Invoice: \$ 1,157.00

Fredrikson

Invoice: 1920660
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0008

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Adversary against EPIC Holdings II

Total for Current Legal Fees: \$ 11,645.00

Total For Current Invoice: \$ 11,645.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



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Invoice: 1920660
Invoice Date: April 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
03/05/25	1914084	3,051.50		3,051.50
Total Prior Balance:				\$ 3,051.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1920660
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0008

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/05/25	S. Kinsella	Draft summary judgment motion.	1.40	889.00
03/10/25	S. Kinsella	Draft summary judgment motion.	5.60	3,556.00
03/11/25	S. Kinsella	Continue to research and draft summary judgment motion.	1.30	825.50
03/12/25	S. Kinsella	Continue to draft summary judgment motion.	0.50	317.50
03/13/25	S. Kinsella	Continue to research and draft summary judgment motion.	0.10	63.50
03/17/25	S. Kinsella	Continue to research and draft summary judgment motion.	4.50	2,857.50
03/18/25	S. Kinsella	Phone call with opposing counsel (.4); finalize draft of summary judgment motion (.9).	1.30	825.50
03/21/25	S. Kinsella	Revise summary judgment motion.	0.10	63.50
03/23/25	S. Kinsella	Revise summary judgment motion.	0.30	190.50
03/24/25	S. Kinsella	Finalize draft of summary judgment motion.	1.10	698.50
03/26/25	K. Nixon	Review and revise draft motion for summary judgment.	2.60	1,261.00
03/31/25	K. Nixon	Phone call with CRO and revise motion for summary judgment.	0.20	97.00
Current Legal Fees:			19.00	\$ 11,645.00

Invoice Totals

Total for Current Legal Fees: \$ 11,645.00

Total For Current Invoice: \$ 11,645.00

Fredrikson

Invoice: 1920661
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0009

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Adversary against U of J MU Jamestown, LLC

Total for Current Legal Fees: \$ 291.00

Total For Current Invoice: \$ 291.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

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Invoice: 1920661
Invoice Date: April 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
03/05/25	1914085	1,247.00		1,247.00
Total Prior Balance:				\$ 1,247.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1920661
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0009

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/11/25	K. Nixon	Review order approving settlement and email interested parties re: the same (0.1); prepare notice of dismissal (0.2).	0.30	145.50
03/12/25	K. Nixon	Finalize notice of dismissal and emails to client and defendant re: the same.	0.20	97.00
03/14/25	K. Nixon	Review judgment/order dismissing case and send the same to client and defendant.	0.10	48.50
Current Legal Fees:			0.60	\$ 291.00

Invoice Totals

Total for Current Legal Fees: \$ 291.00

Total For Current Invoice: \$ 291.00

Fredrikson

Invoice: 1920662
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0010

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Adversary against LTC – The Don, LLC

Total for Current Legal Fees: \$ 1,318.50

Total For Current Invoice: \$ 1,318.50

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



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Tax ID: [REDACTED]

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Invoice: 1920662
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0010

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/10/25	K. Nixon	Respond to email from G. Singer re: tracking information for transfers.	0.10	48.50
03/20/25	S. Kinsella	Draft settlement agreement.	2.00	1,270.00
Current Legal Fees:			2.10	\$ 1,318.50

Invoice Totals

Total for Current Legal Fees: \$ 1,318.50

Total For Current Invoice: \$ 1,318.50

Fredrikson

Invoice: 1920663
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0011

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Adversary against 36th and Veterans, LLC

Total for Current Legal Fees: \$ 2,101.50

Total For Current Invoice: \$ 2,101.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

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Invoice: 1920663
Invoice Date: April 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
03/05/25	1914086	829.00		829.00
Total Prior Balance:				\$ 829.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1920663
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0011

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/03/25	S. Kinsella	Phone call with defendant's counsel (.3); follow up call with client (.3); review proposed schedule (.2).	0.80	508.00
03/03/25	K. Nixon	Review proposed scheduling order, fill in dates, and email opposing counsel re: the same.	0.50	242.50
03/04/25	S. Kinsella	Prepare strategy after status conference and communications with CRO regarding the same.	0.40	254.00
03/04/25	K. Nixon	Prepare for and attend scheduling conference and follow-up emails to client re: the same.	0.60	291.00
03/05/25	K. Nixon	Review scheduling and discovery order, as well as pretrial order, and email client re: the same.	0.20	97.00
03/20/25	S. Kinsella	Review initial disclosures.	0.10	63.50
03/20/25	K. Nixon	Draft initial disclosures and email CRO re: the same.	0.50	242.50
03/21/25	S. Kinsella	Review initial disclosures.	0.10	63.50
03/21/25	K. Nixon	Finalize initial disclosures and email J. Krings re: the same.	0.30	145.50
03/26/25	K. Nixon	Review discovery scheduling order and pre-trial order and email CRO re: upcoming dates and deadlines.	0.40	194.00
Current Legal Fees:			3.90	\$ 2,101.50

Invoice Totals

Total for Current Legal Fees: \$ 2,101.50

Total For Current Invoice: \$ 2,101.50

Fredrikson

Invoice: 1920664
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0012

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Adversary against LTC – The Lincoln, LLC

Total for Current Legal Fees: \$ 63.50

Total For Current Invoice: \$ 63.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

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Tax ID: [REDACTED]

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Invoice: 1920664
Invoice Date: April 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
03/05/25	1914087	1,269.00		1,269.00
Total Prior Balance:				\$ 1,269.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 3, 2025. If payment has been sent close to this date, please verify payment status.

Fredrikson

Invoice: 1920664
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0012

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/20/25	S. Kinsella	Review answer.	0.10	63.50
	Current Legal Fees:		0.10	\$ 63.50

Invoice Totals

Total for Current Legal Fees:	\$ 63.50
Total For Current Invoice:	\$ 63.50

Fredrikson

Invoice: 1920665
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0013

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Adversary against Pioneer Place Holdings, LLC

Total for Current Legal Fees: \$ 481.50

Total For Current Invoice: \$ 481.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



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Tax ID: [REDACTED]

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Invoice: 1920665
Invoice Date: April 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
03/05/25	1914088	1,905.00		1,905.00
Total Prior Balance:				\$ 1,905.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1920665
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0013

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/07/25	S. Kinsella	Communications with interested parties regarding settlement proposal.	0.10	63.50
03/12/25	K. Nixon	Revise motion for default judgment and email client re: the same.	0.20	97.00
03/13/25	K. Nixon	Finalize motion for default judgment and email client re: the same.	0.40	194.00
03/24/25	S. Kinsella	Analyze potential receivership options.	0.20	127.00
Current Legal Fees:			0.90	\$ 481.50

Invoice Totals

Total for Current Legal Fees: \$ 481.50

Total For Current Invoice: \$ 481.50

Fredrikson

Invoice: 1920666
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0014

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Adversary against EPIC Management, LLC

Total for Current Legal Fees:	\$ 2,983.00
Total For Current Costs and Other Charges:	\$ 10.00
Total For Current Invoice:	\$ 2,993.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1920666
Invoice Date: April 3, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
03/05/25	1914089	436.50		436.50
Total Prior Balance:				\$ 436.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of April 3, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1920666
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0014

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/03/25	K. Nixon	Emails to A. Artz and S. Stallings re: domestication of judgment.	0.20	97.00
03/03/25	A. Artz	Prepare domestication of foreign judgments.	0.10	33.00
03/04/25	A. Artz	Prepare domestication of foreign judgments.	0.10	33.00
03/06/25	K. Nixon	Consult regarding domestication of judgment.	0.10	48.50
03/06/25	A. Artz	Analyze additional issues with domestication of foreign judgments.	0.20	66.00
03/07/25	A. Artz	Research and draft domestication of judgment papers.	2.70	891.00
03/07/25	K. Nixon	Consult regarding domestication of judgment.	0.10	48.50
03/10/25	A. Artz	Coordinate filing domestication of judgment documents.	0.10	33.00
03/10/25	K. Nixon	Review domestication of judgment documents.	0.10	48.50
03/11/25	K. Nixon	Review domestication of judgment documents, revise the same, and finalize for mailing.	1.30	630.50
03/11/25	S. Kinsella	Attention to procedure for domesticating judgment.	0.10	63.50
03/12/25	M. Etter	E-file letters, default judgment, and affidavit of identification in Odyssey electronic filing system.	0.40	62.00
03/12/25	K. Nixon	Finalize domestication of judgment documents.	0.40	194.00
03/12/25	A. Artz	Phone conference with Ward County (Minot) District Court Clerk's Office and provide instruction regarding filing of domestication of judgment documents.	1.40	462.00
03/20/25	S. Kinsella	Analyze garnishment issue.	0.10	63.50
03/20/25	K. Nixon	Email CRO re: bank accounts for garnishment.	0.10	48.50
03/21/25	S. Kinsella	Analyze garnishment information.	0.10	63.50



Invoice: 1920666
Invoice Date: April 3, 2025
Page: 2

03/28/25	K. Nixon	Review state court pleadings filed against borrower and email CRO re: the same.	0.20	97.00
Current Legal Fees:			7.80	\$ 2,983.00

Costs and Other Charges

		<u>Amount</u>
03/26/25	US Bancorp (PO Box 6343 Fargo ND 58125) - Fargo - Barr 031725 - Odyssey - Foreign Judgment	10.00

Current Costs and Other Charges:	\$ 10.00
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Invoice Totals

Total for Current Legal Fees:	\$ 2,983.00
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Total For Current Costs and Other Charges:	\$ 10.00
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Total For Current Invoice:	\$ 2,993.00
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Fredrikson

Invoice: 1920667
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0016

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Adversary against HI West Acres, LLC, f/k/a EPIC Hospitality, LLC

Total for Current Legal Fees: \$ 317.50

Total For Current Invoice: \$ 317.50

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1920667
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0016

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/21/25	S. Kinsella	Communications with opposing counsel regarding document requests.	0.10	63.50
03/24/25	S. Kinsella	Communications with client and opposing counsel regarding information requests.	0.40	254.00
Current Legal Fees:			0.50	\$ 317.50

Invoice Totals

Total for Current Legal Fees: \$ 317.50

Total For Current Invoice: \$ 317.50

Fredrikson

Invoice: 1920668
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0019

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Adversary against Fargo South Hospitality, LLC

Total for Current Legal Fees: \$ 556.50

Total For Current Invoice: \$ 556.50

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1920668
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0019

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/11/25	S. Kinsella	Phone call with defendant's counsel (.3); follow up phone call with CRO regarding the same (.3).	0.60	381.00
03/12/25	S. Kinsella	Communications with client and defendant's counsel regarding deadlines.	0.20	127.00
03/25/25	K. Nixon	Email CRO re: filing of answer by defendant.	0.10	48.50
Current Legal Fees:			0.90	\$ 556.50

Invoice Totals

Total for Current Legal Fees: \$ 556.50

Total For Current Invoice: \$ 556.50

Fredrikson

Invoice: 1920669
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0023

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Adversary against The Tracks - Maverick, LLC

Total for Current Legal Fees: \$ 97.00

Total For Current Invoice: \$ 97.00

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.

Fredrikson

Invoice: 1920669
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0023

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/14/25	K. Nixon	Review and revise draft notice of appearance.	0.20	97.00
	Current Legal Fees:		0.20	\$ 97.00

Invoice Totals

Total for Current Legal Fees:	\$ 97.00
Total For Current Invoice:	\$ 97.00

Fredrikson

Invoice: 1920670
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0026

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Dutch Mill Development LLC

Total for Current Legal Fees: \$ 97.00

Total For Current Invoice: \$ 97.00

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.

Fredrikson

Invoice: 1920670
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0026

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/25/25	K. Nixon	Email CRO re: response from defendant.	0.10	48.50
03/26/25	K. Nixon	Email CRO re: order on motion to extend time to respond to complaint.	0.10	48.50
Current Legal Fees:			0.20	\$ 97.00

Invoice Totals

Total for Current Legal Fees:	\$ 97.00
Total For Current Invoice:	\$ 97.00

Fredrikson

Invoice: 1920671
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0027

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through March 31, 2025

Regarding: Adversary against Northern Mall Partners, LLC

Total for Current Legal Fees: \$ 381.00

Total For Current Invoice: \$ 381.00

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

Please remit this page with your payment. Thank you. We appreciate your business.

Fredrikson

Invoice: 1920671
Invoice Date: April 3, 2025
Client Number: 097807
Matter Number: 097807.0027

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/17/25	S. Kinsella	Phone call with opposing counsel.	0.20	127.00
03/24/25	S. Kinsella	Communications with defendant's counsel regarding potential settlement.	0.10	63.50
03/31/25	S. Kinsella	Settlement negotiations.	0.30	190.50
Current Legal Fees:			0.60	\$ 381.00

Invoice Totals

Total for Current Legal Fees: \$ 381.00

Total For Current Invoice: \$ 381.00

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors.

Chapter 11

**NOTICE OF EIGHTH APPLICATION OF FREDRIKSON & BYRON, P.A. FOR
ALLOWANCE OF FEES AND EXPENSES AS CHAPTER 11 COUNSEL FOR THE
DEBTORS FROM MARCH 1, 2025 THROUGH MARCH 31, 2025**

TO: The parties-in-interest as specified in the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court's order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

1. **NOTICE IS HEREBY GIVEN** that Fredrikson & Byron, P.A., as Chapter 11 counsel for the Debtors, has filed its eighth application for allowance of fees and expenses, a copy of which is attached hereto and served upon you.

2. **NOTICE IS FURTHER GIVEN** that any objection to the application must be filed with the Clerk of the United States Bankruptcy Court, whose address is Quentin N. Burdick Courthouse, 655 First Avenue North, Suite 210, Fargo, North Dakota 58102, and served upon the attorney whose name and address is listed below, by **Monday, April 28, 2025, which is twenty-one (21) days from the date of the filing of this Notice**. Any objections not filed and served may be deemed waived.

Dated: April 7, 2025

/e/ Steven R. Kinsella

Michael S. Raum (#05676)

FREDRIKSON & BYRON, P.A.

51 Broadway, Suite 400

Fargo, ND 58102-4991

701.237.8200

mraum@fredlaw.com

Steven R. Kinsella (#09514)

Katherine A. Nixon (*pro hac vice* MN #0402772)

FREDRIKSON & BYRON, P.A.

60 South 6th Street, Suite 1500

Minneapolis, MN 55402-4400

612.492.7000

skinsella@fredlaw.com

knixon@fredlaw.com

ATTORNEYS FOR DEBTORS